

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                       |   |                                  |
|-----------------------|---|----------------------------------|
| IN RE:                | : | CHAPTER 13                       |
| JUSTIN A. LANG and    | : |                                  |
| JAMIE L. LANG,        | : |                                  |
| Debtors,              | : |                                  |
|                       | : | Bankruptcy No. 1:20-bk-02360-HWV |
| M & T BANK,           | : |                                  |
| Movant,               | : |                                  |
|                       | : |                                  |
| v.                    | : |                                  |
|                       | : |                                  |
| JUSTIN A. LANG and    | : |                                  |
| JAMIE L. LANG,        | : |                                  |
| Debtors,              | : |                                  |
| HEATHER LANG,         | : |                                  |
| Co-Debtor,            | : |                                  |
|                       | : |                                  |
| JACK N. ZAHAROPOULOS, | : |                                  |
| Trustee               | : |                                  |

**DEBTOR'S ANSWER TO CERTIFICATE OF DEFAULT**

AND NOW COMES, Debtors, Justin A. Lang and Jamie L. Lang, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Certificate of Default and in support thereof states as follows:

1. Denied. It is believed the Debtors have made said payments to Movant to cure the default before and after the notice was received. Debtors believe that payments have been made to Movant that are not credited on the payment history provided.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny Movant's Certificate of Default and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS, & HARSHBERGER

Dated: January 14, 2022

/s/Chad J. Julius

ID# 209496

8150 Derry Street

Harrisburg, PA 17111.5260

717.909.5858

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| Debtors,              | : |                                  |
| HEATHER LANG,         | : |                                  |
| Co-Debtor,            | : |                                  |
|                       | : |                                  |
| JACK N. ZAHAROPOULOS, | : |                                  |
| Trustee               | : |                                  |

**CERTIFICATE OF SERVICE**

I, Dera Shade, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Certificate of Default upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

**ECF/CM:**

|   |  |
|---|--|
| Jack N Zaharopoulos (Trustee)<br>8125 Adams Drive, Suite A<br>Hummelstown, PA 17036                                     | Rebecca A. Solarz, Esquire<br>KML Law Group, PC<br>701 Market Street, Suite 5000<br>Philadelphia, PA 19106 |
| United States Bankruptcy Court<br>Ronald Reagan Federal Building<br>228 Walnut Street, Room 320<br>Harrisburg, PA 17108 |  |

/s/Dera Shade  
 8150 Derry Street  
 Harrisburg, PA 17111  
 717.909.5858  
 FAX: 717.909.7788  
 Email: dshade@ljacobsonlaw.com

Dated: January 14, 2022